

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

MARK W. DOBRONSKI,
an individual,

Plaintiff,

v.

RENTOKIL NORTH AMERICA, INC.,
A Pennsylvania corporation,

Defendant.

USDC #

Judge

Mag. Judge

Lower Court Case No. 19-80501-GC

MARK W. DOBRONSKI
Plaintiff *Pro Se*
P.O. Box 85547
Westland, MI 48185
(734) 641-2300
markdobronski@yahoo.com

JEFFREY S. HENGEVELD (P66029)
PLUNKETT COONEY
Attorney for Defendant
38505 Woodward Ave., Suite 100
Bloomfield Hills, MI 48304
(248) 594-8202
jhengeveld@plunkettcooney.com

NOTICE OF FILING REMOVAL

NOTICE OF REMOVAL TO FEDERAL COURT

VERIFICATION

CERTIFICATE OF SERVICE

UNITED STATES DISTRICT COURT
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SOUTHERN DIVISION

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NOTICE OF FILING REMOVAL

TO: CLERK OF THE COURT
18th Judicial District Court for the State of Michigan
Mark W. Dobronski, Plaintiff *Pro Se*

Defendant, Rentokil North America, Inc., through its attorneys, Plunkett Cooney, and pursuant to 28 U.S.C. § 1441 *et seq.*, hereby provides notice to the Clerk of the 18th Judicial District Court for the State of Michigan of the removal of this case to the United States District Court for the Eastern District of Michigan, Southern Division.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
Jeffrey S. Hengeveld (P66029)
Attorney for Defendant
38505 Woodward Ave., Ste. 100
Bloomfield Hills, MI 48304
(248) 594-8202
jhengeveld@plunkettcooney.com

Dated: November 14, 2019

PROOF OF SERVICE

The undersigned certifies that on November 14, 2019, a copy of the foregoing document was served upon the attorney(s) of record in this matter at their stated business address as disclosed by the records herein via:

<input type="checkbox"/>	Hand delivery	<input type="checkbox"/>	Overnight mail
<input checked="" type="checkbox"/>	U.S. Mail	<input type="checkbox"/>	Facsimile
<input type="checkbox"/>	Email	<input type="checkbox"/>	Electronic e-file

I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.

/s/Debra L. Vogt
DEBRA L. VOGT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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NOTICE OF REMOVAL TO FEDERAL COURT

TO: HONORABLE JUDGES OF THE U.S. DISTRICT COURT
Eastern District of Michigan, Southern Division
Mark W. Dobronski, Plaintiff *Pro Se*

Defendant, Rentokil North America, Inc., through its attorneys, Plunkett Cooney, and pursuant to 28 U.S.C. § 1441 *et seq.*, removes this action from the 18th Judicial District Court for the State of Michigan, Case No. 19-80501-GC, to the United States District Court for the Eastern District of Michigan, Southern Division. In support of this Removal, Defendant states as follows:

1. Plaintiff filed his Complaint in the 18th Judicial District Court for the State of Michigan on October 25, 2019, which is attached as Exhibit A.

2. Defendant is seeking removal based upon a federal question arising from the alleged violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.*, presented in Plaintiff's Complaint.

3. Given the federal question presented, the District Court of the United States has original jurisdiction under 28 U.S.C. § 1331 and this action is properly removable under 28 U.S.C. § 1441(a).

4. This notice is filed with this Court within thirty (30) days after the Defendant became aware of the matter, which was on October 25, 2019. Removal is therefore timely.

5. A copy of this notice will be given to all adverse parties and to the clerk of the 18th Judicial District Court for the State of Michigan pursuant to 28 U.S.C. § 1446(d).

WHEREFORE, Defendant, Rentokil North America, Inc., requests that this Court assume jurisdiction over this action and grant such other relief as the Court deems proper.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
Jeffrey S. Hengeveld (P66029)
Attorney for Defendant
38505 Woodward Ave., Ste. 100
Bloomfield Hills, MI 48304
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jhengeveld@plunkettcooney.com

Dated: November 14, 2019

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I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.

/s/Debra L. Vogt
DEBRA L. VOGT

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38505 Woodward Ave., Suite 100
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jhengeveld@plunkettcooney.com

VERIFICATION

Jeffrey S. Hengeveld, first being duly sworn, states that he is the attorney for Defendant, Rentokil North America, Inc., and that the foregoing Notice of Removal is true in substance and in fact to the best of his knowledge, information and belief.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
Jeffrey S. Hengeveld (P66029)
Attorney for Defendant
38505 Woodward Ave., Ste. 100
Bloomfield Hills, MI 48304
(248) 594-8202
jhengeveld@plunkettcooney.com

Dated: November 14, 2019

Subscribed and sworn to before me
on the 14th day of November, 2019

/s/ Debra L. Vogt
DEBRA L. VOGT, Notary Public
Oakland County, Michigan
My Commission Expires: 7/7/2021

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CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2019, I electronically filed the foregoing Removal Package with the Clerk of the Court using the ECF system and that I have mailed by United States Postal Service to any parties that are not ECF participants.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
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